



**CONESTOGA-ROVERS
& ASSOCIATES**

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AWMD/WRAP-KNRP

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August 17, 2012

Reference No. 054046

**VIA EMAIL &
FEDEX COURIER**

U.S. Environmental Protection Agency, Region 7
Attn: Chief, RCRA Corrective Action & Permits Branch
Air, RCRA, and Toxics Division
901 N. Fifth Street
Kansas City, Kansas 66101

Dear Sir/Madam

Re: Formal Notification of Additional Solid Waste Management Units (SWMUs)
Occidental Chemical Corporation, 6200 S. Ridge Road, Wichita, Kansas
RCRA ID #KSD007482029

Pursuant to the requirements set out by Part II of the Occidental Chemical Company Wichita Facility's Hazardous and Solid Waste Amendments Permit (RCRA ID# KSD007482029) (Permit) and the Resource Conservation and Recovery Act (RCRA), this letter provides herein formal notification to the United States Environmental Protection Agency (U.S. EPA) of additional SWMUs identified during completion of investigative work as summarized in the Chloromethanes I, II, Perc and Hazwaste Areas RFI and Arkema Area Investigation Summary Report (CRA August 2012), the Penta and Shipping Phase II RFI Summary Report (CRA August 2012), and the Inorganics Area Supplemental Report letter dated August 14, 2012. It was determined that these newly identified units be characterized as SWMUs based on the definitions provided in the Facility's Permit and the characterization of similar units at this Facility.

The newly identified SWMUs include the following:

- **Sump 507** located within the Penta Area; initial SWMU identification and details were provided in the Penta and Shipping Phase II RFI Summary Report (CRA August 2012).
- **Tank 504** located in the Chloromethanes II Area; initial SWMU identification and details were provided in the Chloromethanes I, II, Perc and Hazwaste Areas RFI and Arkema Area Investigation Summary Report (CRA August 2012).
- **Sump 480, Sump 482, Sump 483, Sump 17954, Sump 90083, and Sump 90294** located within the Inorganics Area; initial SWMU identifications and details were provided in the Inorganics Area Supplemental Report letter dated August 14, 2012.

OCC will submit an amended Table F-1 and Figure F-1 of the Permit within 90 days of the date of this notification letter in accordance with the requirements of Section C.3 of Part II of the Permit.

RCRA



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Please do not hesitate to contact me or Juan Somoano (Glenn Springs Holdings, Inc.) if you have any questions or need further information.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Bruce Clegg

BCC/ko/1

cc: David Garrett (U.S. EPA)
Bradley Roberts (U.S. EPA)
Mostafa Kamal (KDHE)
Lisa Blair (OCC)
Juan Somoano (GSHI)